

1 Marc J. Randazza, NV Bar No. 12265
2 Ronald D. Green, NV Bar No. 7360
3 Alex J. Shepard, NV Bar No. 13582
4 RANDAZZA LEGAL GROUP, PLLC
5 2764 Lake Sahara Drive, Suite 109
6 Las Vegas, Nevada 89117
7 Telephone: 702-420-2001
8 Email: ecf@randazza.com

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10 Attorneys for Defendant
11 Barbara Ellestad

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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 JOSEPH MAQUADE CHESLEY, an
17 individual,

18 Plaintiff,

19 v.

20 CITY OF MESQUITE, a government entity,
21 AARON BAKER, an individual,
22 BARBARA ELLESTAD, an individual,
23 DOE INDIVIDUALS 1 through 30; and
24 ROE BUSINESS OR GOVERNMENTAL
25 ENTITIES 1 through 300, inclusive,

26 Defendants.

27 Case No. 2:21-cv-01946-GMN-DJA

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14 **STIPULATION TO EXTEND TIME FOR**
15 **PLAINTIFF TO FILE RESPONSE TO**
16 **DEFENDANT'S SPECIAL MOTION TO**
17 **DISMISS**

18 **(First Request)**

19 Plaintiff Joseph Maquade Chesley and Defendant Barbara Ellestad, by and through their
20 respective attorneys of record, hereby stipulate, subject to this Court's approval, to extend the date
21 by which Plaintiff may file his response to Defendant's Special Motion to Dismiss (ECF No. 16)
22 from December 31, 2021, to January 21, 2022. Defendant's Special Motion to Dismiss was filed
23 on December 17, 2021, and Plaintiff's current deadline to file his response to Defendant's Motion
24 is due on December 31, 2021. This is the first request for an extension of time to file a response
25 to Defendant's Special Motion to Dismiss.
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This stipulation is brought because, in the absence of an extension, the Plaintiff would need to respond on December 31, 2021. There is good cause for extending the deadline, namely that Plaintiff's counsel's time is currently limited due to the holidays, and Plaintiff's lead counsel in this case is currently sick. No party will be prejudiced by granting the requested extension. Additionally, given the holidays and the impact they would have on Plaintiff's ability to respond, the Parties stipulate to extending the response date by 21 additional days.

Dated: December 21, 2021.

/s/ Alex J. Shepard

Marc J. Randazza, NV Bar No. 12265
Ronald D. Green, NV Bar No. 7360
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
Attorneys for Defendant
Barbara Ellestad

/s/ Philip J. Trenchak

Philip J. Trenchak, NV Bar No. 009924
Victoria C. Mullins, NV Bar No. 13546
MULLINS & TRENCHAK, ATTORNEYS AT LAW
1614 S. Maryland Parkway
Las Vegas, Nevada 89104

Attorneys for Plaintiff,
Joseph Maquade Chesley

IT IS SO ORDERED.

Dated this 22 day of December, 2021.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

1 Case No. 2:21-cv-01946-GMN-DJA
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3 **CERTIFICATE OF SERVICE**
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5 I HEREBY CERTIFY that on December 21, 2021, I electronically filed the foregoing
6 document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy
7 of the foregoing document being served via transmission of Notices of Electronic Filing generated
8 by CM/ECF.
9

10 /s/ Alex J. Shepard
11 Alex J. Shepard
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